

ELBOW PARK RESIDENTS' ASSOCIATION  
800 – 34<sup>TH</sup> Avenue S.W.  
Calgary, Alberta  
T2T 2A3

Charitable Registration Number – 13016 7133 RR00001

May , 2015

Worship Mayor Nenshi and Members of Calgary City Council  
City of Calgary  
700 Macleod Trail S.E.  
Calgary, Alberta T2G 2M3

Dear Mayor Nenshi and City Councillors:

**Re: Public Hearing on Land Use Amendments - CPC2015-070 Bylaw 14P2015 (M-2015-002, The City of Calgary) Proposed textual amendments to the Land Use Bylaw 1P2007 to add Secondary Suite as a permitted use, and Backyard Suite as a discretionary use in R-1, R-C1, and R-C1L land use districts in Wards 7, 8, 9, and 11**

As the elected and designated representatives of our Community Association, given the responsibility to speak on behalf of, and in the best interests of our community membership and residents, we herewith state our **opposition** to the proposed Bylaw Amendment as set out above, for the following reasons.

- In the same manner as Community ARP's (Area Redevelopment Plans), the Secondary Suite initiative should also be governed by Community boundaries and Community desires, not on a wide-sweeping ward basis merely for political convenience. The political platform for the proposal has been **altered several times**. Continuously decreasing the areas which would be included in the Secondary Suite initiative, finally to those wards represented by aldermen clearly in favour of same – some of which have very marginal single family residential inventory remaining, and others which are predominately single family makes no sense, other than political. Reclassifying all homes within a ward, merely on the basis of their ward inclusion, disregards geography, community planning, unique features of each neighborhood, and even the fact that ward boundaries change over time as the city grows. With the City currently studying the issue of changing ward boundaries to reflect new population patterns, rezoning on a ward basis is premature and ill-advised.
- On at least 32 previous occasions, City Council has debated the Secondary Suite topic and has been unable to reach consensus. To make these **fast-tracked proposed changes** in four wards only, is an attempt to push through an amendment that would not succeed city-wide, and as an affected Community Association, we are opposed to this "divide and conquer" approach. To single out only four wards from the entire City as an experiment for the proposed changes is categorically not equitable, and the proposal should be dismissed on this basis alone.
- We do not consider this to be a **principled, democratic process** that has received adequate **public engagement**. Four open houses which garnered a total of 738 public attendees – of which only 306 completed feedback forms (support and opposition were roughly equal according to CPC Minutes) – is not considered an adequate mandate to allow the effective reclassification of 35,395 Single Family classified

parcels. Total feedback forms completed at the open houses represent less than one (1.0 %) percent of the affected Single Family properties in the proposed redesignation, and those in favour, less than 0.5%.

- We do not accept the proposed redesignation to be **equitable**. The four affected wards have over 80 separate communities, which have an extremely wide range of housing types and classifications. The affected wards have a total population of over 325,000 people, yet the roughly 50% of open house attendees who completed the feedback forms and were reported to be supportive of the proposal represent approximately 150 people, or less than one half of 1% of the population. Action taken on the merits of these numbers is clearly **statistically flawed**, and cannot be relied upon.
- The Mayor's campaign on Secondary Suites had three inviolate listed criteria to advance the initiative – one being the **need for owner occupancy** in the suited property. Other Councillors stated similar requirements. This condition has now been dropped. With owner occupancy as an enforceable condition, which is possible, it is our view that there could be considerably less opposition to the proposal as presented. All previous discussions of Secondary Suites presumed the owner of the home lived in the suited property. Without this requirement, a suite functions as a de facto duplex. This was never the stated intention of any relaxations or reclassifications of properties to allow for Secondary Suites. Some municipalities clearly make this distinction by differentiating between Secondary Suites and Rental Suites.
- The report from Administration to CPC and City Council identifies a **number of risks** in the proposal as presented. More specifically, under the heading Supporting Information and Analysis, the report states:  
*"Supporting Information and Analysis*  
With clear direction to Administration regarding the proposed amendments provided by Council in 2014 December, **and with a narrow window to undertake the project, the supporting information has been mainly limited to that provided in previous reports."** (Emphasis added)  
The question as to why there needed to be such a narrow window to undertake this major project involving four wards, which affects some 35,400 Single Family property owners, requires a non-political and properly justifiable answer.
- There are **already 120,000 properties** in the City of Calgary with the appropriate land use for secondary suites, but only some 550 legal ones. It is not the appropriate land use that is preventing suites from becoming legal or being built. With an estimated 16,000 suites in the City, this means there are approximately 15,450 illegal secondary suites. There is plenty of work to do with the existing inventory, let alone introduce another potential 35,000 plus units to monitor. Work out the problems with existing suites in already-zoned areas first, before adding more communities to the mix.

For the reasons cited above, as well as those which will be presented orally at the Public Hearing, we are **opposed** to the process advocated for the introduction of Secondary Suites in wards 7, 8, 9 and 11. We appreciate the City of Calgary City Council considering our position very seriously in their debate on this extremely important matter.



J. Paul Bryden

President – Elbow Park Residents' Association